

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

IN THE MATTER OF THE)	
)	
EXTRADITION OF)	Case No.: 1:24-mc-84-JCN
)	
MARIANNE SMYTH)	

MOTION FOR BAIL INTERVIEW

NOW COMES the Defendant, Marianne Smyth, through her attorneys Vafiades, Brontas & Kominsky, LLP, moves this honorable court to order Pretrial Services to conduct a bail interview pursuant to 18 U.S.C. §3154 a Court can order Pretrial Services to interview, prepare and supervise persons. Additionally a similar case in the Eastern District of Illinois *In Re: The Matter of the Extradition of Sotirios Pappas, No. 23 CR 515*, a Pretrial interview was performed on an extradition case and was offered services such as ankle monitoring supervision for bail purposes.

Performing a bail interview and possible services is an integral part of granting bail in these sorts of cases additionally, this Defendant is similarly situated to the Defendant in the USA vs. Pappas case, where the charges from the country seeking extradition are quite old, the Defendant has been living in the open and a member of the community. For those purposes prior to having a detention hearing the Defendant would request that the Court order Pretrial Services to conduct a bail interview and offer any potential services such as ankle monitoring and supervision that may be available to help meet the factors to set bail under the Special Circumstances standard as required by law for this case.

AUSA Joel Casey objects to the granting of this motion.

WHEREFORE, for the reasons stated above, Ms. Smyth respectfully requests that this Court order Pretrial Services to conduct a bail interview.

DATED this 29th day of February, 2024.

/s/ Kaylee J. Folster, Esq.
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UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2024, I electronically filed the Motion for Bail Interview with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following: AUSA Joel B. Casey and USPO Stacy Laflin. I hereby certify that on February 29, 2024, I have mailed by United States Postal Service, the document(s) to the following non-registered participants: Marianne Smyth, c/o Piscataquis County Jail, 52 Court Street, Dover-Foxcroft, ME 04426.

/s/ Kaylee J. Folster, Esq.
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